



ANTI-CORRUPTION AND ANTI-BRIBERY



Overview and Objective

NASA Transport Corp., Ltd and NASCO shipping co., Ltd have determined to conduct business in line with laws against corruption and bribery involving officials in the government and employees of the private sectors either within or outside the country. Violation of these laws is regarded as inappropriate and not in compliance with the Company's Corporate Governance policy. Executives and employees at all levels are required to oppose and refrain from such acts.



Definition

Corruption refers to conducting, or abstaining from conducting one's duties, or exerting one's power improperly in all forms, whether for the giving or taking of bribes, or offering or promising to offer a bribe. This also includes asking for or demanding assets or money as well as gifts, rights or other benefits that are opposed to morality and ethics as well as being opposed to laws, rules, regulations and policies. This covers any conduct which leads to the organization, employees or related parties to receiving benefits to which they are not entitled. This applies both domestically and overseas with government officials or individuals involved in the business of NASA Transport Corp., Ltd and NASCO shipping co., ltd



Related Parties refer to spouses, children, parents, siblings or close relatives of Directors, Executives and Staff Members at all levels of PTTGC and its subsidiaries.

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ANTI-CORRUPTION GUIDANCE

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Personnel at all levels of NASA Transport Corp., Ltd and NASCO shipping co., ltd must perform their duties in compliance with practice as follows:

❖ Abide by the Anti-Corruption and Anti-Bribery Policy and the Business Code of Conduct as well as the rules and regulations of PTTGC without involvement in any forms of corruption, either directly or indirectly.

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❖ Do not act in any way that indicates an intent of corruption including giving or taking bribes to and from stakeholders of NASA Transport Corp., Ltd and NASCO shipping co., ltd . This includes any act through the work function of personnel carried out under their responsibilities, either directly or indirectly in order to gain benefits to the organization, employees or related parties.

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ANTI-CORRUPTION GUIDANCE

❖ Do not neglect or ignore any acts that are witnessed that could be within the scope of corruption involving NASA Transport Corp., Ltd and NASCO shipping co., ltd . It is the duty of all employees to report such a matter to their supervisors or responsible persons, and fully cooperate in any investigation that may follow

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ANTI-CORRUPTION GUIDANCE

❖ For any operations that are prone to corruption, personnel at all levels of NASA Transport Corp., Ltd and NASCO shipping co., Ltd are required to perform in the following instances with utmost caution:

The offering and accepting of gifts as well as any kind of entertainment or other related expense that needs to adhere to the good practice stipulated in the Corporate Governance and the Business Code of Conduct Handbook, and also that of the Anti-Corruption Guidance of NASA Transport Corp., Ltd and NASCO shipping co., Ltd .

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ANTI-CORRUPTION GUIDANCE

The offering and accepting of gifts as well as any kind of entertainment or other related expense that needs to adhere to the good practice stipulated in the Corporate Governance and the Business Code of Conduct Handbook, and also that of the Anti-Corruption Guidance of NASA Transport Corp., Ltd and NASCO shipping co., Ltd .

In regard to monetary donations for charitable purposes, such contributions must be made on behalf of NASA Transport Corp., Ltd and NASCO shipping co., Ltd . to trustworthy and certified organizations, which aim to benefit society. The donation must be performed in a transparent and lawful manner through the specified procedures of the Company. In addition, it must also be traced and monitored to ensure that such donations will not be used as excuses for bribery.

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To offer support, either in the forms of money, items or assets, to any activity or project, the name of NASA Transport Corp., Ltd and NASCO shipping co., Ltd must be specified. Such offering must be conducted with the purpose to promote the businesses as well as maintain the good image of the Company or its subsidiaries. Furthermore, this must be carried out in a transparent and lawful manner through the specified procedures of the Company.

Any operations in regard to business relations or procurement with both public and private sectors must be carried out in a transparent and honest manner in accordance with applicable laws. They include any contacts with officials in both public and private sectors including those involved in business operations of NASA Transport Corp., Ltd and NASCO shipping co., Ltd both domestically and internationally.

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ANTI-CORRUPTION GUIDANCE

NASA Transport Corp., Ltd and NASCO shipping co., Ltd has implemented a neutral political policy. Each member of staff has political rights and freedoms according to the law. However, they need to bear in mind that they are not to perform or carry out any political activities or exploit the resources of company in any political activities, which could cause company to lose its neutrality or sustain liability from such involvement or provision of political support.

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ANTI-CORRUPTION GUIDANCE

Measure

NASA Transport Corp., Ltd and NASCO shipping co., Ltd will support and encourage its personnel at all levels to realize the importance of countering corruption and raise their awareness in this respect. In addition, company has implemented effective **internal controls** to prevent all forms of corruption and bribery in every business unit.

The Anti-Corruption Guidance also covers **Human Resources procedures**, from the recruitment and selection process to the promotion, training, performance appraisal and compensation offered to Staff Members. Supervisors at all levels have a duty to communicate with their subordinates to make them understand and adopt these guidelines in all business activities under their responsibility. The supervisors are also to control and ensure their operational efficiency in compliance with these guidelines.

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ANTI-CORRUPTION GUIDANCE

Measure

NASA Transport Corp., Ltd and NASCO shipping co., Ltd will ensure **fairness and protection of its Staff Members including those who act as whistleblowers** who report clues and evidence about corruption involving the Company and its subsidiaries. Additionally, Staff Members who refuse to cooperate will also be protected. Our protective measures have been provided to whistleblowers as well as those who give the full support to making a corruption report as stipulated in our Whistleblower Policy.

Offenders of corruption are considered those who violate employment regulations in regard to personnel management. These offenders will receive **disciplinary punishment as well as legal punishment if such offences are also against the law.**

Company will undergo constant reviews of these guidance and operation measures to ensure their compliance with changes in laws as well as changing situations of our business operations.

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